EDWARD H. KUBO, JR. United States Attorney District of Hawaii

ELLIOT ENOKI First Assistant U.S. Attorney

KENNETH M. SORENSON
Assistant U.S. Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850

Attorneys for Plaintiff UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 2 4 2002

at ________O'clock and _______M

WALTER A.Y.H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 02-00031 DAE
Plaintiff,)	
vs.))	SUPERSEDING INDICTMENT [18 U.S.C. §876
SHARON CARDENAS)	18 U.S.C. §2332a]
Defendant.)	

SUPERSEDING INDICTMENT

COUNT 1

The Grand Jury charges:

On or about April 10, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to Mr. And Mrs. Conrado Lazo, at 98-1637

Kiawe Street, Aiea, Hawaii 96701, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 2

The Grand Jury further charges:

On or about July 28, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to House of Finance, Attn: Roland Casamina 1810 N. King Street, Suite A, Honolulu, Hawaii 96819, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 3

The Grand Jury further charges:

On or about July 28, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to Architects Hawaii Ltd., Attn: Frank

Cruzata, 1001 Bishop Street, Honolulu, Hawaii, 96813, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 4

The Grand Jury further charges:

On or about August 11, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to, or intended to be sent to, Conrado Lazo, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 5

The Grand Jury further charges:

On or about August 11, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to, or intended to be sent to, Roland

Casamina, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 6

The Grand Jury further charges:

On or about August 11, 2000, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to, or intended to be sent to, Francisco Cruzata, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 7

The Grand Jury further charges:

On or about November 16, 2001, in the District of Hawaii, SHARON CARDENAS, the defendant, knowingly did deposit or cause to be deposited in an authorized depository for mail matter, to be sent and delivered by the United States Postal Service, a written communication, addressed to Gendrano Buddy

Realty, Inc., Attn. Buddy/Melga, 202 Lejua Avenue, Suite #1, 96782# Pearl City, Hawaii 96815, containing a threat to injure the person of the addressee, or of another.

All in violation of Title 18, United States Code, Section 876.

COUNT 8

The Grand Jury further charges:

On or about November 19, 2001, in the District of
Hawaii, SHARON CARDENAS, the defendant, did knowingly threaten to
use a weapon of mass destruction, to wit, the biological agent
anthrax, against a person within the United States, the results
of said use would have affected interstate and foreign commerce
in that defendant sent through the United States mail to the
Waikiki Beach Marriot Resort Hotel a letter containing a material
or substance imitating the appearance and texture of powdered
anthrax thereby forcing the closure of a public business and the
summoning of police, rescue and hazardous material teams.

All in violation of Title 18, United States Code, Sections 2332a(a)(2) and 178.

COUNT 9

The Grand Jury further charges:

On or about November 30, 2001, in the District of Hawaii, SHARON CARDENAS, the defendant, did knowingly threaten to use a weapon of mass destruction, to wit, the biological agent anthrax, against a person within the United States, the results of said use would have affected interstate and foreign commerce in that defendant sent through the United States mail to the Honolulu Police Department, Main Station, a letter containing a material or substance imitating the appearance and texture of powdered anthrax thereby forcing the closure and evacuation of a portion of the police department, and the summoning of a hazardous materials team.

All in violation of Title 18, United States Code, Sections 2332a(a)(2) and 178.

COUNT 10

The Grand Jury further charges:

On or about November 30, 2001, in the District of Hawaii, SHARON CARDENAS, the defendant, did knowingly threaten to use a weapon of mass destruction, to wit, the biological agent anthrax, against a person within the United States, the results of said use would have affected interstate and foreign commerce in that defendant sent through the United States mail to the

Honolulu Police Department, Kalihi substation, a letter containing a material or substance imitating the appearance and texture of powdered anthrax thereby forcing the closure and evacuation of a portion of the police department and the summoning of a hazardous materials team.

All in violation of Title 18, United States Code, Sections 2332a(a)(2) and 178.

COUNT 11

The Grand Jury further charges:

On or about November 30, 2001, in the District of
Hawaii, SHARON CARDENAS, the defendant, did knowingly threaten to
use a weapon of mass destruction, to wit, the biological agent
anthrax, against a person within the United States, the results
of said use would have affected interstate and foreign commerce
in that defendant sent through the United States mail to the
Honolulu Police Department, Pearl City Station, a letter
containing a material or substance imitating the appearance and
texture of powdered anthrax and forcing the closure and
evacuation of a portion of the police department, and the
summoning of a hazardous materials team.

All in violation of Title 18, United States Code, Sections 2332a(a)(2) and 178.

COUNT 12

The Grand Jury further charges:

On or about December 17, 2001, in the District of Hawaii, SHARON CARDENAS, the defendant, did knowingly threaten to use a weapon of mass destruction, to wit, the biological agent anthrax, against a person within the United States, the results of said use would have affected interstate and foreign commerce in that defendant sent through the United States mail to the business Dynamic Island Terminix a letter containing a material or substance imitating the appearance and texture of powdered anthrax thereby forcing the closure of a public business and the summoning of police, rescue and hazardous material teams.

All in violation of Title 18, United States Code, Sections 2332a(a)(2) and 178.

DATED: April 24, 2002, at Honolulu, Hawaii.

FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR. United States Attorney

District of Hawaii

ELLIOT ENOK

First Assistant U.S. Attorney

KENNETH M. SORENSON

Assistant U.S. Attorney